

Exhibit F



SEEGERWEISS_{LLP}

77 Water Street, New York, NY 10005 P 212.584.0700 F 212.584.0799 www.seegerweiss.com

August 10, 2017

Via Email and Federal Express Overnight Mail

Gail Milon
Cambridge Capital Group, LLC
1400 Village Square Blvd.
Suite 3-268
Tallahassee, FL 32312

Timothy Howard, J.D., Ph.D.
tim@howardjustice.com
Cambridge Capital Group, LLC
2120 Killarney Way
Suite 120
Tallahassee, FL 32309

Re: *In re National Football League Players' Concussion Injury Litigation*,
No. 2:12-md-02323-AB (E.D. Pa.)

Dear Messrs. Milon and Howard and/or Sir/Madam:

I am Co-Lead Class Counsel for the certified and finally approved Settlement Class in the above-referenced *In re: National Football League Players' Concussion Injury Litigation* ("NFL Concussion Litigation"). I am writing to you related to an Order issued on July 19, 2017 by the MDL Judge presiding over the NFL Concussion Litigation, the Honorable Anita B. Brody, a copy of which is included in the attachment hereto.

This Order authorizes me to conduct discovery of entities and individuals soliciting and/or entering into agreements with the Class Members in the NFL Concussion Litigation or with others related to the Settlement. Therefore, I am propounding the enclosed Requests for Production of Documents and Interrogatories upon Cambridge Capital Group, LLC, Gail Milon and Timothy Howard, J.D., Ph. D. If you and your organization are represented by counsel, please forward this letter and attachment to your counsel immediately.

As per Judge Brody's Order, the deadline for responding to this discovery is fourteen days. Accordingly, the responses to the attached are due on August 25, 2017.

In connection with this discovery, I am also authorized to conduct depositions for the purpose of presenting evidence to the Court at the hearing scheduled for September 19, 2017, to address the matters discussed in the July 19th Order. As such, please provide me with dates

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Cambridge Capital Group, LLC, Messrs. Milon and Howard

August 10, 2017

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during the weeks of August 21 and August 28, on which Messrs. Milon and Howard, and/or others from your organization who have information related to these matters, will be available for depositions and the preferred location(s) for same.

If you have any questions, please contact my partner in our Philadelphia office, TerriAnne Benedetto, at 215-564-2300, or tbenedetto@seegerweiss.com.

Very truly yours,

/s/ Christopher A. Seeger

Christopher A. Seeger
Co-Lead Class Counsel

Enclosures

cc (via email)(w/encls.):

Brad Karp, Esq. (*Counsel for the NFL Parties*)



SEEGERWEISS_{LLP}

77 Water Street, New York, NY 10005 P 212.584.0700 F 212.584.0799 www.seegerweiss.com

August 11, 2017

Via Federal Express Overnight Mail

Jeffrey Kahn
Cambridge Capital Group, LLC
1400 Village Square Blvd.
Suite 3-268
Tallahassee, FL 32312

Re: In re National Football League Players' Concussion Injury Litigation,
No. 2:12-md-02323-AB (E.D. Pa.)

Dear Mr. Kahn:

I am Co-Lead Class Counsel for the certified and finally approved Settlement Class in the above-referenced *In re: National Football League Players' Concussion Injury Litigation* ("NFL Concussion Litigation"). I am writing to you related to an Order issued on July 19, 2017 by the MDL Judge presiding over the NFL Concussion Litigation, the Honorable Anita B. Brody, a copy of which is included in the attachment hereto.

This Order authorizes me to conduct discovery of entities and individuals soliciting and/or entering into agreements with the Class Members in the NFL Concussion Litigation or with others related to the Settlement. Therefore, I am propounding the enclosed set of Requests for Production of Documents and Interrogatories upon you and your organization, Cambridge Capital Group, LLC.

As per Judge Brody's Order, the deadline for responding to this discovery is fourteen days. Accordingly, the responses to the attached are due on August 25, 2017.

In connection with this discovery, I am also authorized to conduct depositions for the purpose of presenting evidence to the Court at the hearing scheduled for September 19, 2017 to address the matters discussed in the Order. As such, please provide me with dates during the weeks August 21 and August 28, on which you will be available for deposition and the preferred city for same.

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Newark

Philadelphia

Jeff Kahn
August 11, 2017
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If you have any questions, please contact Ms. Benedetto, at 215-564-2300, or
tbenedetto@seegerweiss.com.

Very truly yours,

/s/ Christopher A. Seeger

Christopher A. Seeger
Co-Lead Class Counsel

Enclosures

cc (via email)(w/encls.):

Brad Karp, Esq. (*Counsel for the NFL Parties*)

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

Kevin Turner and Shawn Wooden,
*on behalf of themselves and
others similarly situated,*

Plaintiffs,

v.

National Football League and
NFL Properties LLC,
successor-in-interest to
NFL Properties, Inc.,

Defendants.

THIS DOCUMENT RELATES TO:
ALL ACTIONS

No. 2:12-md-02323-AB

MDL No. 2323

Hon. Anita B. Brody

Civ. Action No. 14-00029-AB

**REQUESTS FOR PRODUCTION OF DOCUMENTS AND INTERROGATORIES
DIRECTED TO RESPONDENTS, CAMBRIDGE CAPITAL GROUP, LLC,
GAIL MILON, TIMOTHY HOWARD, J.D., PH.D., AND JEFF KAHN**

Pursuant to the Court's Order dated July 19, 2017 (ECF No. 8037), Co-Lead Class Counsel hereby serve the following Requests for Production of Documents and Interrogatories (collectively "Discovery Demands") to be responded to by August 25, 2017 by respondents, Cambridge Capital Group, LLC, Gail Milon, Timothy Howard, J.D., Ph.D., and Jeff Kahn. A copy of that July 19, 2017 Order accompanies these Discovery Demands.

DEFINITIONS AND INSTRUCTIONS

Unless otherwise indicated, the following definitions and terms shall be applicable to the Discovery Demands contained herein, and you are requested to provide the information required by each definition, where applicable.

1. The “Settlement” means the Class Action Settlement (As Amended), dated February 13, 2015 [ECF No. 6481-1], and finally approved by the Honorable Anita Brody of the United States District Court for the Eastern District of Pennsylvania on April 22, 2015 [ECF No. 6509], available at <https://www.nflconcussionsettlement.com/Documents.aspx>.

2. The “BAP” means the Baseline Assessment Program, as defined in section 2.1(i) an Article V of the Settlement.

3. The “MAF” means the Monetary Award Fund, as defined in section 2.1(bbb) and Article VI of the Settlement.

4. “Medical Services” means any consultation, evaluation, examination, treatment, or diagnosis with or from a medical professional.

5. “Solicitation” means any communication, whether printed, electronic, telephonic, mailed, emailed, on the internet, which was intended, in whole or in part, to seek representation of, or to provide monies or other services to Retired NFL Football Players.

6. “Communication” or “Communicated” means any written statement whether in print or electronic form, as well as any oral communications, in person or over the telephone or internet medium.

7. “Identify,” when used with respect to a person, means to state the full name, current address, or if not available, last known address, telephone number and email address, if known, and affiliation with any organization, corporation, firm or other entity. “Identify,” when

used with respect to a document, means to state the author(s), date, recipient(s), type, subject matter and any other identifying information with respect to the document.

8. “Retired NFL Football Player” means all living retired NFL football players, as that term is specifically defined in section 2.1(ffff) of the Settlement.

9. “You” or “Your” means Cambridge Capital Group, LLC, Gail Milon, Timothy Howard, J.D., Ph.D., and/or Jeff Kahn, and their present and former directors, officers, employees, contractors, agents, consultants, and affiliates and their attorneys, or other persons acting for or on behalf of any of them.

10. In order to bring within the scope of these interrogatories and requests for production of documents all conceivably relevant information that might otherwise be construed to be outside their scope:

- a. the singular of each word shall be construed to include its plural and vice versa;
 - b. “and,” as well as “or,” shall be construed conjunctively as well as disjunctively;
- and
- c. “all,” “any,” “each,” and “every” shall each be construed as all, any, each and every.

REQUESTS FOR PRODUCTION

Request No 1.

Produce exemplars of all Solicitations that You directed toward Retired NFL Football Players.

Request No 2.

Produce all Communications that You had with Retired NFL Football Players related to the Settlement.

Request No 3.

Produce all Communications that You had with any other person or entity related to the Settlement, including, but not limited to MAF or BAP examinations, other Medical Services, loans or asset purchases, or related in any way to MAF Monetary Awards. This also includes Communications with hedge funds related to providing funding and/or any services in conjunction with the Settlement.

Request No 4.

Produce all agreements that You entered into with any other person or entity related to the Settlement.

Request No 5.

Produce all agreements that You entered into with any Retired NFL Football Player.

Request No 6.

Produce all agreements that You entered into related to any MAF Monetary Awards that might be made through the Settlement.

Request No 7.

Produce all agreements that You entered into related to any other benefit that may be provided through the Settlement, including through the BAP or any comparable Medical Services.

Request No 8.

Produce any recordings of conversations related to the Settlement that You had with any person or entity.

INTERROGATORIES

Interrogatory No 1.

Identify every Retired NFL Football Player with whom You have entered into any agreement related to the Settlement and state the nature of each agreement into which You entered with each Retired NFL Football Player.

Interrogatory No 2.

Identify every Retired NFL Football Player referred for, sent to, or scheduled for any type of Medical Services, by You, anyone working on Your behalf, or working in conjunction with You in any way, regardless of whether the medical services were performed by someone affiliated with You or Your organizations or not.

Interrogatory No 3.

Identify every Retired NFL Football Player for whom You, or anyone working on Your behalf, or working in conjunction with You in any way, have been involved in the payment, directly or through others, for a Retired NFL Football Player's expenses (whether on a non-recourse or recourse basis) in connection with obtaining any Medical Services to assist the Retired NFL Football Player in any way in participating in the Settlement.

Interrogatory No 4.

Identify every individual and entity with whom You, anyone working on Your behalf, or working in conjunction with You in any way, have worked or Communicated in connection with any Retired NFL Football Player's obtaining any Medical Services to assist the Retired NFL

Football Player in any way in participating in the Settlement and/or receiving funds from You, including, but not limited to, medical providers. For each such individual and/or entity, explain the details of the relationship and identify each Retired NFL Football Player involved.

Interrogatory No. 5.

Identify every individual and entity with whom You, anyone working on Your behalf, or working in conjunction with You in any way, have any financial relationship or understanding, whether recourse or non-recourse, whether in writing or verbal, related to any Retired NFL Football Player's participation in the Settlement. For each such individual and entity, explain the details of the relationship and identify each Retired NFL Football Player involved. Identify any document related to the relationship.

Interrogatory No. 6.

Identify every individual and entity from whom You have obtained the contact information for any Retired NFL Football Player, including their home or cellular telephone numbers, home or business addresses and email addresses.

Interrogatory No. 7.

Identify every individual and entity to whom You have provided any contact information for any Retired NFL Football Player.

Interrogatory No. 8.

Identify every person or entity with whom You have entered into any agreement, whether written or verbal, related to the Settlement, including but not limited to, the securing of funds to provide advances, loans or monies under any other arrangements to Retired NFL Players, the referral of Retired NFL Football Players for loans or provisions of money under other terms, for legal or other representation or for Medical Services related to the Settlement, or

the suggestion to Retired NFL Football Players that they contact individuals or entities in connection with loans or provisions of money under other terms, for legal or other representation or for Medical Services related to the Settlement, and state the nature of each agreement.

Interrogatory No. 9

Identify every individual and entity with whom You, anyone acting on Your behalf, or working in conjunction with You in any way, Communicated related to the Settlement, or related to the Solicitation of Retired NFL Football Players.

Dated: August 10, 2017

/s/ Christopher A. Seeger
Christopher A. Seeger
SEEGER WEISS LLP
77 Water Street
New York, NY 10005
Phone: (212) 584-0700
Fax: (212) 584-0799
cseeger@seegerweiss.com

Co-Lead Class Counsel